

STATE OF IOWA
BEFORE THE IOWA UTILITIES BOARD

IN RE:)	
)	DOCKET NO. RMU-2016-0003
REVIEW OF ELECTRIC)	
INTERCONNECTION OF)	ADDITIONAL COMMENTS
DISTRIBUTED GENERATION)	
FACILITIES RULES [199 IAC)	
CHAPTER 45])	
)	

The Environmental Law & Policy Center (ELPC), Iowa Environmental Council (IEC), and Interstate Renewable Energy Council, Inc. (IREC), collectively file these comments in response to the Iowa Utilities Board's Order Requesting Additional Comments issued on October 18, 2016.

On July 22, 2016, the Iowa Utilities Board (Board) issued an Order commencing rulemaking on proposed amendments to Iowa Administrative Code Chapter 45. This rulemaking represents the culmination of a thorough reexamination of Iowa's interconnection standards that the Board initiated as part of NOI-2014-0001.

The Board received five sets of comments on the proposed amendments including joint comments from ELPC, IEC and IREC. In response to those comments, the Board proposed several changes to the rules including moving the pre-application report, supplemental review process, and interconnection fees from the Board website to rules, and providing disconnection of the distributed generation system as the remedy rather than immediately resorting to disconnection of electric service. The Board specifically noted that it was not requesting further comment on those revisions unless a participant believes there may be unintended consequences

from proposed changes. As we previously noted, the Board's proposed rulemaking incorporates important best practices that stakeholders put forward on a consensus basis during NOI-2014-0001. The Board's revisions strengthened the proposed rule updates, and we are appreciative that the Board continues to incorporate key areas of agreement to improve Iowa's interconnection standards.

The Board noted that IPL "proposed several revisions to the rules that were not proposed or discussed in Docket No. NOI-2014-0001." The Board Order specifically requested comments on those items that IPL proposed for the first time in comments on the rulemaking.

IPL proposed the addition of language regarding affected systems. We agree with IPL that it is appropriate to clarify the process for review where there may be impacts to an affected system—such as impacts on the transmission system—that are beyond the authority of the reviewing utility. For this reason, we do not object to IPL's proposed revisions to the rules' language regarding affected systems. However, where impacts to an affected system need to be studied by the relevant owner or authority, and that authority is not within the Board's jurisdiction, there is a need to ensure that the utility communicates promptly and efficiently with the affected system owner, and the interconnection customer, about that review in order to prevent delays and to keep the interconnection review moving. Accordingly, in addition to adding the language proposed by IPL, the Board should consider adopting language which makes it clear that it is the obligation of the utility to coordinate with the affected system owner to ensure results of any affected system study are received in a timely manner. Specifically, we propose adding the following language to section 45.11(6): "The utility shall coordinate with any affected system owners regarding potential impacts to affected systems in a timely manner and include the results of such studies along with the system impacts study."

IPL also proposed several changes to the interconnection forms. We have no objection to IPL's proposed changes to the forms.

We appreciate the additional opportunity to address new issues raised in the September 6, 2016, round of comments. The Board's thoughtful and thorough approach to this rulemaking has resulted in revisions to Iowa's interconnection standards that will reduce barriers to the development of distributed generation and make Iowa a leader on interconnection standards. We encourage the Board to move forward with these rules.

DATE: November 7, 2016

Respectfully submitted,

/s/ Joshua T. Mandelbaum

Joshua T. Mandelbaum (AT0010151)
Environmental Law & Policy Center
505 5th Avenue, Suite 333
Des Moines, Iowa 50309
P: (515) 244-0253
jmandelbaum@elpc.org

/s/ Nathaniel Baer

Nathaniel Baer
Iowa Environmental Council
521 East Locust, Suite 220
Des Moines, Iowa 50309
P: (515) 244-1194 x206
baer@iaenvironment.org

/s/ Sky Stanfield

Sky Stanfield
Interstate Renewable Energy Council, Inc.
Shute, Mihaly & Wienberger LLP
396 Hayes Street
San Francisco, CA 94102
P: (415) 552-7272
stanfield@smwlaw.com